

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	Case No. 19 Cr. 366 (LGS)
- against -	:	
	:	DECLARATION OF
STEPHEN M. CALK,	:	PAUL H. SCHOEMAN, ESQ.
	:	
<i>Defendant.</i>	:	
	:	
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PAUL H. SCHOEMAN, ESQ., hereby declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am a partner at the law firm of Kramer Levin Naftalis & Frankel LLP, counsel for defendant Stephen M. Calk in the above-captioned action.

2. I submit this Declaration to provide the Court with information pertinent to Mr. Calk's motion to preclude evidence obtained by the improper grand jury subpoena served on Lieutenant General Randall Rigby.

3. Exhibit A is a copy of Randall Rigby's March 4, 2021 grand jury testimony transcript in *United States v. Stephen M. Calk*.

4. Exhibit B is a copy of Special Agent James Hilliard's March 4, 2021 grand jury testimony transcript in *United States v. Stephen M. Calk*.

5. Exhibit C is a copy of Special Agent James Hilliard's March 4, 2021 PowerPoint presentation to the grand jury in *United States v. Stephen M. Calk*, entitled "Grand Jury Presentation – Proposed Superseding Indictment."

Dated: New York, New York
May 19, 2021

/s/ Paul H. Schoeman
Paul H. Schoeman